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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 *****

9 CHARLESTON RANCHO, LLC, a Nevada
limited liability company,

Case No.: 2:18-cv-02205 (APG VCF)

10 Plaintiffs,

11 vs.

**MOTION TO EXTEND TIME TO
ANSWER, MOVE, OR OTHERWISE
RESPOND TO COMPLAINT
(First Request)**

12 STANLEY CONVERGENT SECURITY
SOLUTIONS, INC., a foreign corporation; DOES
13 1 through x; and ROE CORPORATIONS XI
through XX,

14 Defendant.

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17 Pursuant to FRCP 6 (b)(1)(A), and the reasons stated below, Stanley Convergent Security
18 Solutions, Inc. ("Stanley") moves for additional time to respond to Plaintiffs' Complaint:

19 1. Movant is the Defendant in the above-entitled action pursuant to a Complaint filed in
20 the 8th Judicial District Court, Clark County, Nevada ("State Court") on October 4, 2018, entitled
21 *CHARLESTON RANCHO, LLC, a Nevada limited liability company, v. STANLEY CONVERGENT*
22 *SECURITY SOLUTIONS, INC., a foreign corporation; DOES I through X; and ROE*
23 *CORPORATIONS XI through XX..* (Case No. A-18-782271-C).

24 2. Movant removed this action from State Court to this Court by its Petition for
25 Removal on November 16, 2018 [ECF Doc. 1].
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1 Pursuant to Rule 81(c)(2)(C) of the Federal Rules of Civil Procedure, Defendant
2 currently must answer, move, or otherwise respond to the Complaint on or before November 26,
3 2018 (within 7 days after the notice of removal is filed).

4 Defendant respectfully moves the Court to extend the time for Defendant to answer,
5 move, or otherwise respond to the Complaint for an additional 14 days, until on or before December
6 7, 2018. Defendant respectfully requests such additional time in light of the Thanksgiving holiday
7 occurring before the current answer/response deadline, and in order for Defendant to also address
8 this Court's order regarding Defendant's statement regarding removal [ECF Doc. 3].

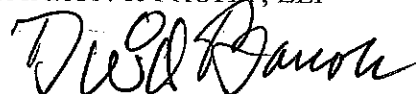
9 This is Defendant's first motion for extension of time to answer, move, or otherwise
10 respond to the Complaint, and is sought by Movant in the interests of justice.

11 Counsel for Defendant has conferred with counsel for Plaintiff, and Plaintiff is
12 unopposed to the extension of time requested herein.

13 WHEREFORE, STANLEY CONVERGENT SECURITY SOLUTIONS, INC. prays that
14 this Court grant the extension of time sought by Movant, and extend the time for Defendant to
15 answer, move, or otherwise respond to the Complaint of an additional 14 days, until on or before
16 December 7, 2018.

17 Dated: November 26, 2018

18 BARRON & PRUITT, LLP

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20 DAVID BARRON, ESQ.
21 Nevada Bar No. 142
22 3890 West Ann Road
23 North Las Vegas, Nevada 89031
24

25 IT IS SO ORDERED

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27 UNITED STATES MAGISTRATE JUDGE

28 DATED: 11-30-2018

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 26th day of November, 2018, I served the foregoing
MOTION TO EXTEND TIME TO ANSWER, MOVE, OR OTHERWISE RESPOND TO
COMPLAINT (First Request) as follows:

☐ US MAIL: by placing the document(s) listed above in a sealed envelope, postage
prepaid, in the United States Mail at Las Vegas, Nevada, addressed to the following:

☐ BY FAX: by transmitting the document(s) listed above via facsimile transmission to the
fax number(s) set forth below.

☐ BY HAND-DELIVERY: by hand-delivering the document(s) listed above to the
address(es) set forth below.

☐ BY EMAIL: by emailing the document(s) listed above to the email address(es) set forth
below.

☒ BY ELECTRONIC SERVICE: by electronically serving the document(s) listed above
with the PACER system upon the following:

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